

The Honorable Craig Goldblatt
United States Bankruptcy Court for the District of Delaware
824 North Market Street
3rd Floor, Courtroom 7
Wilmington, DE 19801

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CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE

Re: Chapter 11, Case No. 24-11649 (CTG) Docket No. 1183

December 29, 2024

Dear Judge Goldblatt,

I am writing to respond to the 'Objection' to our claim against Sunpower Corporation which is number 11280. We have a SunPower solar system on our house in Palm Desert, CA with a fully paid-upfront lease. We have filed this claim because for nearly a year, one of our two inverters for our solar panels has not functioned. Despite our multiple attempts in the last 10 months, SunPower has not provided the needed repairs, resulting in a significant decrease in our panel performance, and a year-end electric bill of over \$4,000. Furthermore, SunPower has done almost nothing to advise us of the status of our lease after the bankruptcy, such as who is responsible for repairing their equipment, and what will happen to the 'production guarantee' of power that SunPower agreed to in our lease contract. We have just received a document "The Plan Administrator's fourth omnibus objection to certain reclassified claims, cross-debtor duplicate claims, and substantive duplicate claims and hearing thereon" last evening. We are asked to outline why we believe that our claim against SunPower is valid.

1. First, we object to the notice given about the 'Objection'. This document was filed with the court on 12/19/24. We received the document in the US mail at 4 pm PST on 12/28/24, and a response

is required by January 2, 2025 at 4 pm EST. This ridiculously brief time interval from delivery of the document includes a Sunday, New Year's Eve, and New Year's Day. Thus, even if we wanted legal counsel about this 'Objection', we would have only one working day to obtain it, and only one full 'post office day' for it to reach the court and the 'administrator'. To be fair, Mark Roberts, as plan administrator, had far more time to prepare the document we received late yesterday, while we had only one day to prepare a response. If this is how citizens are treated by the Federal Courts, I have lost all faith in our judicial system.

2. Despite this, we believe our claim is still valid for a number other of reasons.
 - a. Our inverter malfunctioned in February of 2024. SunPower agreed to monitor our production and notify us if there were equipment issues. No notification ever occurred from SunPower.
 - b. We notified SunPower in early March that the inverter wasn't working. SunPower twice scheduled repairs, but no one ever showed up to perform the repair. This was months before SunPower sought bankruptcy protection. After our second attempt to schedule repairs, we were never able to reach anyone at SunPower or our installer and our messages have gone unanswered.
 - c. Since the bankruptcy, SunPower has never given us any information about the status of our lease, who is responsible for repairs, or what will happen to the production guarantees that they promised in the contract. We have no information about what the status of the solar system would be if we sell our house, and no information about what will happen to the system at the end of the lease. They DID provide access to the company (SunStrong Management) that is collecting lease payments, but our lease is fully paid. I have contacted SunStrong three times via their web portal to ask about

repairs and have had no response. In summary, I believe our claims remain valid because SunPower has given us no other avenue to address our problems with our solar system other than this claim. In 10 months, despite multiple attempts on our part, we still have a broken inverter which we are paying for (in our fully paid lease) and additionally are paying for electricity from our utility (which we wouldn't need if the inverter was repaired.)

Your Honor, what we are asking for is only what SunPower agreed to in their contract with us. To me this would include:

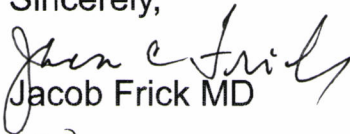
1. Repair of the inverter that has been broken since February of 2024
2. Payment of our electric bill for 2025 (attached)
3. An additional year added to our lease at no charge (since they didn't honor the lease for almost all of 2024)
4. Information, in plain English, about who is now responsible for repairs and how to contact them.
5. A summary of what portions of our lease survived the bankruptcy. For instance: what happens to the system at the end of the lease?; or if we sell our house?; or to our production guarantee?; or to the monitoring of our system? All of these important issues were in their lease agreement, and three months after the bankruptcy we are still waiting for this information. It is SunPower who has broken the lease agreement, not us, and SunPower should be responsible for providing this information to its former customers.

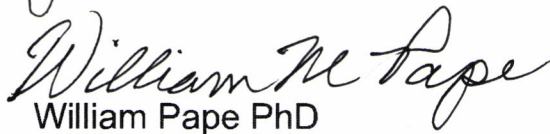
The 'Objection' is entirely unreasonable due to its strategic Holiday timing. My husband has a PhD in Engineering and I am a medical doctor, but we can't really understand all of the legalese contained in the

'Objection'. We were unable to find an attorney willing to help us with SunPower here in Palm Desert, CA, given that the bankruptcy was filed 3,000 miles away in Delaware. We did understand that the 'Objection' document asked for legal reasons why we believe our claim should stand. The legal reason is this: We have a contract with SunPower which they haven't fulfilled since February of 2024. We have a fully paid 20 year lease on a solar system that hasn't worked in 10 months. The lease holder (SunPower, or whoever it is now) has not repaired our solar system, and we can't repair it ourselves because we don't own it. We see the bankruptcy as our last opportunity to remedy this. If our claim is allowed, we still see no benefit in flying to Delaware to appear in Federal Court without proper representation, but we do hope that justice will yet be served either by SunPower finally honoring its lease agreement, or through your Honor's intervention.

We appreciate your time and judicial service.

Sincerely,


Jacob Frick MD


William Pape PhD

SOUTHERN CALIFORNIA
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1-866-701-7868
www.sce.com

Your electricity bill

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Customer Account
700100524275Date bill prepared
12/23/24Amount due \$3,929.03
Due by 01/13/2548420 TERRENA CT
PALM DESERT, CA 92260-6600

SETTLEMENT BILL

Your account summary

Credit from previous billing	- \$690.56
Credit balance	- \$690.56
Your new charges	\$4,619.59
Total amount you owe by 01/13/25	\$3,929.03

*This is your 12-month settlement bill**Your 12-month billing period for Net Energy Metering (NEM) is now complete. Your 12-month settlement charges are \$4,618.26.*

Your statement includes your applicable medical baseline allocation.

You are billed annually for your energy charges because they can be offset by energy credits over your 12-month billing period. Any charges not offset by credits are due now.

Get a discount on your bill every month

Your income may qualify you for discounted bills through the CARE or FERA program. To enroll or learn more, visit sce.com/careandfera or call 1-800-798-5723.

Recibe un descuento en tu factura cada mes

Si cumples los requisitos de ingresos, podrias recibir descuentos en tus facturas gracias a los programas CARE o FERA. Para inscribirte o obtener mas informacion, visita sce.com/carefera o llama al 1-800-798-5723.

Summary of your billing detail

Service account	Service address	Billing period	Your rate	New charges
8000372832	48420 TERRENA CT PALM DESERT, CA	11/22/24 to 12/22/24	DOMESTIC	\$1.33

(Continued on next page)

(14-574)

Tear here

Please return the payment stub below with your payment and make your check payable to Southern California Edison.
If you want to pay in person, call 1-800-747-8908 for locations, or you can pay online at www.sce.com.

Tear here

SOUTHERN CALIFORNIA
EDISON[®]An EDISON INTERNATIONAL[®] CompanyCustomer account 700100524275
Please write this number on the memo line of your check. Make your check payable to Southern California Edison.

Amount due by 01/13/25

\$3,929.03

Amount enclosed

\$

STMT 12232024 P1

PAPE, WILLIAM
48420 TERRENA CT
PALM DESERT CA 92260-6600P.O. BOX 600
ROSEMEAD, CA 91771-0002

700100524275 0000681 000000000000461959000392903

Ways to contact us

Customer service numbers

General Services (U.S. & Canada) 1-800-655-4555
Payments, Extensions or Payment Options 1-800-950-2356
Emergency Services & Outages 1-800-611-1911
California Alternate Rates for Energy (CARE) 1-800-447-6620
Energy Theft Hotline 1-800-227-3901
Hearing & Speech Impaired (TTY) 1-800-352-8580

Relay calls accepted

Multicultural services

Cambodian / ភ្នំ 1-800-843-1309
Chinese / 中文 1-800-843-8343
Korean / 한국어 1-800-628-3061
Vietnamese / Tiếng Việt 1-800-327-3031
Spanish / Español 1-800-441-2233

Correspondence:

Southern California Edison
P.O. Box 6400
Rancho Cucamonga, CA
91729-6400

www.sce.com

Request a large print bill 1-800-655-4555

Important information

What are my options for paying my bill?

On-line Pay one-time or recurring on www.sce.com/bill
Mail-in Check or Money order
In Person Authorized payment locations 1-800-747-8908
Phone QuickCheck 1-800-950-2356
Debit & credit card 1-833-425-1440
Other PayPal, Venmo, Apple Pay and Google Pay

Electronic check processing

Your check payment will be processed as a one-time Electronic Fund Transfer (EFT). With EFTs, funds may be withdrawn from your account the day we receive your payment. Your check will not be returned, but will appear on your financial statement.

Rates and applicable rules: Available at www.sce.com or upon request.

Past due bills

When is my bill past due? It is past due 20 days after the preparation date, which was 12/23/24.

- Reconnecting service that has been disconnected requires a Service Connection payment (non-residential only).
- Unable to pay: If payment arrangements were not extended to you by SCE pursuant to SCE's filed tariffs, you may contact the California Public Utilities Commission.
- For safety reasons, if service is disconnected, please ensure any sensitive or potentially hazardous equipment is unplugged on the day of reconnection. For additional home safety tips, visit www.sce.com/safety or call SCE at 1-800-655-4555.

What is the Late Payment Charge (LPC)?

0.6% will be applied to the total unpaid balance if payment is not received by the due date on this bill (except for CARE and state agency accounts).

What is a rotating outage?

Rotating outages are controlled electrical outages used to avoid widespread or uncontrolled blackouts. Your Rotating Outage Group number is located on page 1, upper left, of your SCE bill. Your rotating outage group number may change at any time. For more information, visit www.sce.com/rotating outage.

What is the Power Charge Indifference Adjustment (PCIA)?

The PCIA is a charge to ensure that both SCE customers and those who have left SCE service to purchase electricity from other providers pay for the above market costs for electric generation resources that were procured by SCE on their behalf. 'Above market' refers to the difference between what the utility pays for electric generation and current market prices for the sale of those resources.

Disputed bills

If you believe there is an error on your bill or have a question about your service, please call Southern California Edison (SCE) customer support at 1-800-655-4555. If you are not satisfied with SCE's response, submit a complaint to the California Public Utilities Commission (CPUC) at www.cpuc.ca.gov/complaints/. The CPUC's Consumer Affairs Branch (CAB) handles billing and service complaints and can be reached by:

Telephone 1-800-649-7570 (8:30 AM - 4:30 PM, Monday - Friday)
Mail CPUC, Consumer Affairs Branch, 505 Van Ness Ave., Room 2003, San Francisco, CA 94102

If you have limitations hearing or speaking, contact the California Relay Service, which is for those needing assistance relaying telephone conversations. Dial 711 or one of the numbers below to be routed to a California Relay Service provider in your preferred mode of communication.

Type of Call	English	Spanish
TTY/VCO/HCO to Voice	1-800-735-2929	1-800-855-3000
Voice to TTY/VCO/HCO	1-800-735-2922	1-800-855-3000
Speech-to-Speech Relay	1-800-854-7784	1-800-854-7784

To avoid having service turned off while waiting for the outcome of a complaint to the CPUC regarding the accuracy of your bill, contact CAB for assistance. If your case meets the eligibility criteria, CAB will instruct you on how to mail a check or money order to be impounded pending resolution of your case. You must continue to pay your current charges while your complaint is reviewed to keep your service turned on.

Definitions

- Baseline Credit: The baseline credit provides reduced electricity rates on electricity used up to the baseline allocation for the region that you live in.
- CA Climate Credit: Credit from state effort to fight climate change. Applied monthly to eligible businesses and semi-annually to residents.
- Wildfire Fund Charge: Supports the California Wildfire Fund which covers costs associated with catastrophic wildfires, including payment of bonds issued by the California Department of Water Resources (DWR)
- Public Purpose Programs Charge: Funds state-mandated programs for low income discounts, energy efficiency, renewable energy and R&D.
- SCE Generation: For recovering energy procurement and generation costs for that portion of your energy provided by SCE.

To change your contact information or enroll in SCE's payment option, complete the form below and return it in the enclosed envelope.

Change of mailing address: 700100524275

STREET#	STREET NAME	APARTMENT #
CITY	STATE	ZIP CODE
TELEPHONE #	E-MAIL ADDRESS	

Direct Payment (Automatic Debit) Enrollment: 700100524275

I hereby authorize SCE and my financial institution to automatically deduct my monthly payment from the checking account as shown on my enclosed check, ten calendar days after my bill is mailed.

Signature _____ Date _____

To change your checking account information or to be removed from the Direct Payment program please call SCE at 1-800-655-4555.

Energy Assistance Fund (EAF): I want to help people pay their energy bill through EAF. For info visit www.sce.com/eaf or call (800) 205-8596.

Add this amount for EAF \$ _____

Select one box only and sign below for EAF:

☐

Every Month

☐

One Month only

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Summary of your billing detail (continued)

Service account	Service address	Billing period	Your rate	New charges
8000372832	48420 TERRENA CT	12/22/23 to 12/22/24	DOMESTIC	\$4,618.26
Billing adjustment	PALM DESERT, CA			
				\$4,619.59

Things you should know

Fixed Recovery Charge

SCE has been permitted to issue bonds that enable it to recover more quickly certain costs related to preventing and mitigating catastrophic wildfires. Your bill for electric service includes a Fixed Recovery Charge that has been approved by the CPUC to repay those bonds. The right to recover the Fixed Recovery Charge has been transferred to a separate entity (called the Special Purpose Entity) that issued the bonds and does not belong to SCE. SCE is collecting the Fixed Recovery Charge on behalf of the Special Purpose Entity.

Stay in Control

If you're behind on payments, enrolled in a payment plan, or facing disconnection, we offer options and energy management solutions to help you stay in control of your bill and costs. Learn more at www.sce.com/billsupport.

California Climate Credit Rollover Information

Your electricity bill for this month may reflect a credit amount. This may be due in part to the California Climate Credit included in the "Delivery charges" section of your October 2024 electricity bill.

Edison Scholars \$50,000 STEM Scholarship

Edison International is offering \$50,000 scholarships to 30 high school seniors that want to make a difference in the world by studying science, technology, engineering, or math (STEM) in college. Students must be passionate about making the world a better place, have at least a 3.0 GPA, plan to pursue a STEM major, and live in SCE's service area. Applications must be submitted by January 23, 2025. Learn more at edisonscholars.com.

Service account	8000372832	POD-ID
Service address	48420 TERRENA CT	101760940001448226
	PALM DESERT, CA 92260	
Rotating outage	Group A049	

Your past and current electricity usage

Electricity (kWh)	
11/22/24 to 12/22/24	
Consumption	1,307
Net Generation	-88
Total electricity usage this month in kWh	1,219

Your next billing cycle for meter 222012-154728 will end on or about 01/22/25.

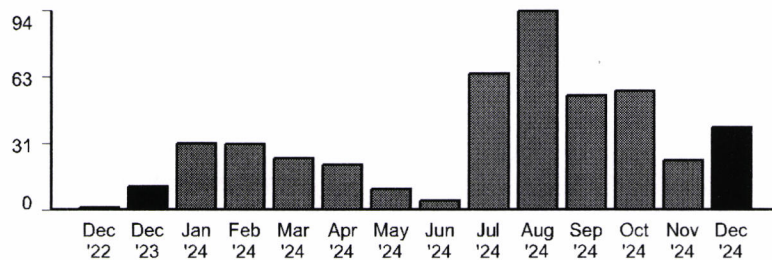
Consumption is the total amount of electricity imported from SCE.

Net generation is the amount of excess electricity exported to the grid by your generating system.

Total electricity usage is your system's total net generation minus your total consumption.

Your daily average electricity usage (kWh)

2 Years ago: 1.03 Last year: 11.03 This year: 39.32



Your monthly usage may be higher than usual... Based on your historical usage pattern, your monthly usage is trending higher than normal. As a result, you may notice an increase in your bill. If you would like information on tips and programs that can help you lower your energy usage and your bill, please visit www.sce.com/billhelper.

Details of your new charges

Your rate: DOMESTIC MED BSLN
Billing period: 11/22/24 to 12/22/24 (31 days)

Delivery charges - Cost to deliver your electricity

Basic charge	31 days x \$0.03100	\$0.96
Subtotal of your new charges		\$0.96
State tax	1,219 kWh x \$0.00030	\$0.37
Your new charges		\$1.33

Your Delivery charges include:

- \$0.96 distribution charges

Your overall energy charges include:

- \$3.65 franchise fees

Additional information:

- Medical baseline allocation: 2 units
- Service voltage: 240 volts
- Your winter med baseline allowance: 1,023.0 kWh
- Your winter baseline allowance: 301.0 kWh
- Net Surplus Compensation (NSC) option: Rollover

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Details of your tracked charges

Your rate: DOMESTIC MED BSLN

Billing period: 11/22/24 to 12/22/24 (31 days)

Delivery charges - Cost to deliver your electricity

Energy-Winter

Tier 1 (within baseline)	1,219 kWh x \$0.19809	\$241.47
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Generation charges - Cost to generate your electricity

SCE

Energy-Winter

Tier 1 (within baseline)	1,219 kWh x \$0.12282	\$149.72
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Other charges or credits

Fixed recovery charge	1,219 kWh x \$0.00188	\$2.29
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Energy Charge Total		\$393.48
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Additional information regarding
your Net Consumption/Generation :

- Your year-to-date energy charges total as of previous month: \$4,224.78
 - Your current month energy charge total: \$393.48
 - Your year-to-date energy charges: \$4,618.26*
 - Your year-to-date kWh: 13,844 kWh
- *If you earned a credit on your bill, the amount you receive may be less than your year-to-date energy Charge which is based on SCE's rates. Your "Compensation Total" is based on the year-to-date kWh shown above, which is then multiplied by a CPUC approved value per kWh.

Your Total Usage: 1,219 kWh	Tier 1	Tier 2
Understanding Your Bill... Your usage for the billing period falls into Tier 1. For most customers, the price you pay increases as you use more energy. The average cost per kilowatt (kWh) in the chart to the right is based on averages. Actual prices may vary.	1,219 kWh	0 kWh
	\$0.32/kWh	\$0.41/kWh
	Your Total Usage 1,219 kWh	

